January 31, 2002

Mr. Christy Miller
Supreme Corporation
16500 County Road 38
Goshen, Indiana 46528

Re: 039-15157
First Administrative Amendment to
Part 70 039-6046-00103

Dear Mr. Miller:

Supreme Corporation was issued a permit on April 19, 2001 for a heavy truck and bus painting and parts manufacturing plant. A letter requesting a change in the permit was received on November 15, 2001. The changes requested qualify for "revisions in descriptive information where the revision will not trigger a new applicable requirements" under 326 IAC 2-7-11. Therefore, the permit is hereby administratively amended as follows (changes are bolded and deletions are struck-through for emphasis):

Request 1: Please change the responsible official listed on page 5 of 54 Section A.1 from Omer kropf to Christy Miller, Vice President manufacturing.

Response 1: Section A.1 has been changed to the following:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary heavy truck and bus painting and parts manufacturing plant.

Responsible Official: ~~Omer Kropf, President~~
Christy Miller, Vice President Manufacturing

Request 2: Please incorporate the latest CFA emission factor (UEF July 17, 2001) into the allowable emission factor calculations. The permit currently use the UEF CFA April 20, 1999 which does not include emission calculations for the use of flow coater/FIT technology in the gelcoat operations. Supreme Corporation recently upgraded their spray systems into FIT technology and would like to claim emission reductions allowed.

Response 2: The source emissions has been recalculated using the latest emission factor (UEF CFA July 17, 2001), taking into account the source new spray systems (FIT technology). Reduction in emission will result using the FIT spray systems. See below emission calculations:

Emission Unit	Material	Density (lb material/Gal material)	Weight % Monomer or VOC	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF1 (lbs monomer/ton material)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Transfer Efficiency	Potential PM (tons/ yr)	BACT Limited Monomer Content (%)	UEF2 (lbs Monomer/ton mat'l)	Theoretical BACT Limit (tons/yr)
M-1	53384D	9.7	29.90%	5.00	3.330	~~42~~ **42**	81.40	14.86	100%	0.00	35%	~~14~~ **49**	17.33
	Catalyst DDM 9	8.0	76.00%	0.29	3.330	N/A	140.91	25.72	100%	0.00	N/A	N/A	0.00
M-2	040-4369	9.1	35.33%	11.00	4.670	78	437.55	79.85	100%	0.00	35%	77	78.83
	5776W90269	10.8	35.00%	4.32	4.670	~~336~~ **214**	559.52	102.11	100%	0.00	37%	~~377~~ **232**	110.70
	Catalyst DDM 9	8.0	76.00%	0.88	4.670	N/A	596.27	108.82	100%	0.00	N/A	N/A	0.00
M-4	040-4369	9.1	35.33%	11.00	0.670	78	62.77	11.46	100%	0.00	35%	77	11.31
	5776W90269	10.8	35.00%	4.32	0.670	~~336~~ **214**	80.27	14.65	100%	0.00	37%	~~377~~ **232**	15.88
	Catalyst DDM 9	8.0	76.00%	0.88	0.670	N/A	85.55	15.61	100%	0.00	N/A	N/A	0.00
M-3	5776W90269	10.8	35.00%	4.32	4.670	~~336~~ **214**	559.52	102.11	75%	0.00	37%	~~377~~ **232**	110.70
M-5	5776W90269	10.8	35.00%	4.32	0.670	~~336~~ **214**	80.27	14.65	75%	0.00	37%	~~377~~ **232**	15.88
M-9	944WT140	10.8	37.00%	6.50	0.670	~~377~~ **232**	120.78	22.04	75%	0.00	37%	~~377~~ **232**	23.90
M-6	040-4369	9.1	35.30%	21.50	0.670	144	226.52	41.34	85%	55.72	35%	140	40.19
	Catalyst DDM 9	8.0	76.00%	1.23	0.670	N/A	120.25	21.95	85%	1.04	N/A	N/A	0.00
M-7	040-4369	9.1	35.30%	21.50	0.670	144	226.52	41.34	85%	55.72	35%	140	40.19
	Catalyst DDM 9	8.0	76.00%	1.23	0.670	N/A	120.25	21.95	85%	1.04	N/A	N/A	0.00
M-8	040-4369	9.1	35.30%	21.50	0.670	144	226.52	41.34	85%	55.72	35%	140	40.19
	Catalyst DDM 9	8.0	76.00%	1.23	0.670	N/A	120.25	21.95	85%	1.04	N/A	N/A	0.00
B-1	E-704-FD	9.1	50.00%	5.00	0.004	~~354~~ **124**	0.27	0.05	75%	0.00	35%	~~140~~ **77**	0.03
B-2(a)	E-704-FD	9.1	50.00%	55.00	0.004	~~354~~ **124**	2.98	0.54	85%	0.00	35%	~~140~~ **77**	0.34
B-2(b)	040-4369	9.1	35.30%	55.00	1.330	144	1150.27	209.92	75%	471.60	35%	140	204.09
N-3(a)	5776W90269	10.8	35.00%	0.63	0.888	336	24.36	4.45	75%	4.30	37%	377	4.99
	Catalyst DDM 9	8.0	76.00%	0.04	0.880	N/A	5.14	0.94	75%	0.07	N/A	N/A	0.00
N-3(b)	5776W90269	10.8	35.00%	0.63	0.888	336	24.17	4.41	75%	4.27	37%	377	4.95
	Catalyst DDM 9	8.0	76.00%	0.04	0.880	N/A	5.14	0.94	75%	0.07	N/A	N/A	0.00
								Total ~~1063.40~~ **922.99**		~~861.13~~ **650.60**			~~880.60~~ **719.51**

Request 3: Equipment that used to be located in the D Building listed on Page 7 of 54 items (ee) and (ff) were modified to flow coat technology. In doing this, it was necessary to install one (1) wall mount stationary chop/resin wet out system to the flow coat technology Model number FIT-c-wmb-m53 Fit Chop system and in place of the one gelcoat gun located in item (ee) Supreme installed 5-pail rider systems all wall mounted. These Pail rider systems are small gel systems that allow for the use of flow coat technology to be used in an area where air atomization was previously used. In making the switch to equipment that would provide less emissions, the number of systems increased due to color change requirements. Each color used has its own gun. Only one gun is in operation at a time. This change does not increase potential emissions or create emission increases. It is an equipment technology change only.

Response 3: A re-calculation of the emissions from emission units in items (ee) and (ff) were made to reflect the new flow coat technology. See above table for detailed calculations. However, it is not necessary to change the emission units description as they are not described in detail currently.

Request 4: The pultrusion operation identified as M-1 Operations on Page 20 of 23 is being relocated to the P-Building.

Response 4: IDEM, OAQ will allow the relocation of the pultrusion operation within the source, since there are no applicable requirements that will be affected by this change. IDEM, OAQ has re-calculated the emissions from this operation since a closed molding emission factor was used in the issued Part 70 permit instead of a pultrusion emission factor (see above emission calculations). Item (y) is amended as follows:

(y) A plastic pultrusion machine, identified as M-1 constructed in February 1991, with a maximum capacity of 3.33 parts/hour, equipped with no controls, and exhausting within the building **has been relocated to the P-Building**.

Request 5: Please remove the bun foam operation from the D-Building location. This operation is listed on Page 6 of 23 of the TSD document under Insignificant Activities. Supreme Corporation currently purchases foam blocks and only cuts them into size now. This operation has also moved from the D-Building to the P-Building.

Response 5: Since the permit does not have a list of insignificant activities without applicable requirements, which include the bun foam operation, no changes will be made to the Part 70 permit. However, this will serve as a note that the bun foam operation was moved from the D-Building to the P-Building.

Request 6: Please note that Supreme would like to install a booth area to isolate the gelcoat/resin operations, which is currently conducted in an open area in the M-Building. This booth would help to divide the Flat Panel area from the Contoured Parts area, in order that fibers from the Flat Panel Area will not contaminate parts being made at the Contoured Parts area. No new equipment will be added. This booth would be located in the Old pultrusion area of the M-Building.

Response 6: Since the gelcoat/resin operation is existing, and no new spray systems are added, the isolation of the gelcoat/resin operation through the installation of a booth is acceptable.

Therefore, item (bb) is amended as follows:

(bb) A portable gelcoat ~~gun~~ **FIT System**, identified as M-3, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-3.

One (1) small vehicle roof resin/gelcoat booth to be located in the old pultrusion area of the M-building to isolate the Flat Panel area from the Contoured Parts area, in order that fibers from the Flat Panel Area will not contaminate parts being made at the Contoured Parts area, utilizing existing gelcoat FIT system M-3 and existing Chop system M-6, with emissions from the booth exhausting through existing Stack SV-M-1.

Request 7: Supreme has upgraded the old atomization gun systems to flow coat technology. The following is a list of changes that have been made:

(b) Item (z) , reciprocator identified as M-2 performing gelcoating and resin flow lamination now has FIT systems for both gel and resin application. All the venus and old magnum systems were replaced.

(c) Item (bb), portable gelcoat gun, identified as M-3 has been replaced with a Magnum MASFIT-G-SM-MS20 Gel FIT/AAA Portable system. (Flat Panel Area Front)

(d) Item (aa) reciprocator identified as M-4 has replaced the resin system with FIT-C-M53 A Automatic Chop FIT System for resin application. Due to the change in flow coat technology, the gel system has been taken off of the reciprocator and is being used as a portable system. This system is a MAS/FIT Gsm-MS20 Fit/AAA portable system. (Bus Roof Area)

(e) Item (cc) reciprocator identified as M-5 portable gel gun has been upgraded to a Magnum Portable Fit system MAS/FIT-G-SM-MS20-GELFIT System AAA/Portable System. It is now located in the flat panel area near stack ID SV-MI.

(f) Item (dd) identified as M-6 portable chop resin wet out gun system has been upgraded to a Magnum FIT C-CMB-MS3 Chop Fit System, located in the flat panel area near stack ID SV-M1.

(g) Item (dd) identified as M-7 and M-8 portable chop resins have been replaced with two (2) FIT-C-WBB-MS3 Chop Fit Wall Mount Systems, this is in the Tru-Green area.

(h) Because of the switch from regular atomized or air assisted air application of resin materials M-6 identified as portable chop resin wet out system was also used for spraycore reinforcement materials. The change in using flow coat technology does not allow for the same system to be used for regular neat resin systems and the spraycore reinforcement material, therefore, the spraycore application is using a core replacement system, portable 23:1 chop check pump

at 3.3 gpm max. The addition of this equipment doesn't increase potential emissions or create emission limitation increases. For future reference this system should be noted as the SprayCore System. It will not be used for any other type of resin application process. (Bus roof and wall area)

(i) Item (cc) identified as M-9 portable gelcoat gun system has been replaced with MAS FIT-G-SM-MS20 gel Fit/AAA portable system, located in the Tru-Green area.

(j) Item (gg) Venus portable airless/air assisted cup gun was replaced with a Portable cup gun granite spray system, (used only for Harris Kayot products).

(k) Supreme would like to request permission to purchase one or more portable airless/air assisted cup gun to be used in the mold repair area. Currently molds are being brought from the B-Building into the M-Building to be sprayed with gelcoat. The addition of this cup gun system would not increase potential emissions. This is a product currently being produced, it would help improve the quality of the part.

Response 7: (a) A re-calculation of the emissions from the gelcoating in item (z) was made reflecting the new flow coat technology. The resin application already reflect the use of a FIT system. Amendment is as follows:

(z) A reciprocator, performing gel coating **operation using FIT System** and resin flow coating lamination, identified as M-2, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-2.

(b) A re-calculation of the emissions from the portable gelcoat operation in item (bb) was made reflecting the new flow coat system (Magnum MASFIT-G-SM-MS20 Gel FIT/AAA Portable system). See above table for detailed calculations. Amendment is as follows:

(bb) A portable gelcoat ~~gun~~ **FIT System**, identified as M-3, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-3.

(c) Although, a new automatic Chop FIT system for resin application will replace the existing Flow Coat system for unit M-4 in item (aa), emissions will stay the same. However, the gel application will be re-calculated to reflect a MAS/FIT system, which will result in a lower emissions. Amendment is as follows:

(aa) **A new portable MAS/FIT system for gel application**, **a** reciprocator, performing ~~gel coating and~~ resin **lamination using a new automatic Chop FIT system** ~~flow coating~~, identified as M-4, constructed in February 1991, with a maximum production of 0.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M

(d) A re-calculation of the emissions for M-5 and M-9 in item (cc) was made to reflect the new FIT system MAS/FIT-G-SM-MS20-GELFIT System AAA/Portable System. See above table for detailed calculations. Amendment is as follows:

(cc) Two portable gelcoat ~~guns~~ operations, identified as M-5 and M-9 constructed in February 1991**, both guns have been upgraded to a Portable FIT system**, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stacks SV-M-5 and SV-M-9. **M-5 is now located in the Flat Panel area, and M-9 is located in the Tru-Green area**.

(e) Although, a new FIT system will replace the existing air-assisted air application for unit M-6 in item (dd) for the application of chop resin wet out, emissions will not be re-calculated to reflect this new FIT system, since the spraycore reinforcement application will remain using an atomized gun system, which is worst in this case. Emission calculation has to be based on the worst case. Amendment is as follows:

(dd) Three portable chop/resin guns, identified as M-6, M-7, and M-8. **M-6 gun has been upgraded with a portable Chop FIT System, for the application of chop resin wet out, and an atomized gun for the application of spraycore reinforcement. M-7 and M-8 have been replaced with Chop FIT Wall Mount System. All have been** constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stack SV-M-6, SV-M-7, and SV-M-8.

(f) See above Response 7(e).

(g) See above Response 7(e)

(h) See above Response 7(d).

(i) Item (gg) which is currently a Venus portable airless/air-assisted spray system will be allowed to change into a portable cup gun granite spray system, since no emissions increase will result as the current emissions calculated where based on an atomized system which is the worst in this case. Amendment to item (gg) is as follows:

(gg) A Tru-green mold repair spray gun, identified as B-2(b), constructed in August 1990. with a maximum capacity of 1.33 parts/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2. **Existing Venus portable airless/air-assisted spray system will be changed into a portable cup gun granite spray system**.

(j) IDEM/OAQ will allow the addition of a new cup gun system, since gelcoating of the mold where the new cup gun will be used is an existing operation. The addition of a cup gun will just eliminate the hassle of transferring the molds from

one building to another for gelcoating, but will not result in additional emissions.

The change will not result in emissions increase, nor result in new applicable requirements. The Best Available Control Technology (BACT) determined for the source is not affected by the change either. However, all conditions referencing the old emission factor have been amended to reflect the latest emission factor (UEF, CFA July 17, 2001). Page numbering has also been changed due to the change in some emission units description.

All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Greg Wingstrom, Tony Pelath
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Supreme Corporation
16500 County Road 38
Goshen, Indiana 46528

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6046-00103	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 19, 2001 Expiration Date: April 19, 2006
First Administrative Amendment No: 039-15157	Pages Affected: 5, 6, 7, 8, 9, 35, 35, 36, 37, 38, 39 40, 41
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date:January 31, 2002

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary heavy truck and bus painting and parts manufacturing plant.

Responsible Official:	Christy Miller, Vice President Manufacturing
Source Address:	16500 County Road 38, Goshen, IN 46528
Mailing Address:	P. O. Box 463, Goshen, IN 46526
Phone Number:	219 / 642 - 4888
SIC Code:	3713, 3089
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) A spray/bake booth, identified as H-1, constructed June 1991, which may coat metal or fiberglass reinforced plastic (FRP) surfaces, with a maximum production capacity of 1.66 units per hour, equipped with a dry filter for particulate matter (PM) control, equipped with a 32,000 acfm exhaust fan, and exhausting to stack SV-H-1

(b) A bake booth, identified as H-4, constructed November 4, 1999, which serves as an additional bake booth for sprayed parts from spray/bake booth H-1, with a rated heat input of 1.2 MMBtu per hour, with no controls, and exhausting to stack SV-H-4

(c) Two spray/bake booths, identified as H-2 and H-3, constructed May 28, 1997, which may coat metal or FRP surfaces, each with a maximum production capacity of 0.375 units per hour, each equipped with dry filters for particulate matter (PM) control, each equipped with a 32,000 acfm exhaust fan, and exhausting to stacks SV-H-2 and SV-H-3

(d) An HVLP paint area, identified as A-1, constructed in June 1991, with a maximum production capacity of 3.1 metal truck rear-end parts per hour, equipped with dry filters for PM control, and exhausting to stack SV-A-1

(e) A base coat booth, identified as I-1, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units/hour, equipped with a dry filter for PM overspray control, and exhausting to stack SV-I-1

(f) A spray/bake booth, identified as I-2, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units per hour, and a maximum heat input capacity of 1.0 MMBtu per hour, equipped with a down draft dry filter system for PM overspray control, and exhausting through stack SV-I-2

(g) Two HVLP spray paint areas, identified as 1-1 and 1-2, constructed July 25, 1991, each with a maximum production capacity of 1.33 metal rear parts/hour, each equipped with a dry filter for PM control, and exhausting through stacks SV-1-1 and SV-1-2

(h) An undercoating air assisted spray booth, identified as 1-4, constructed July 25, 1991, with a maximum production capacity of 1.33 metal frames per hour, equipped with a dry filter for PM control, and exhausting through stack SV-1-4

(i) A spray paint booth, identified as P-6, constructed July 25, 1991, with a maximum capacity of 0.88 metal or FRP units/hour, equipped with a dry filter for PM control, and exhausting through stack SV-P-6

(j) A spray paint area, identified as P-7, constructed July 25, 1991, with a maximum capacity of 16.66 metal parts/hour, equipped with a dry filter for PM control, and exhausting through stack SV-P-7

(k) A surface touch-up spray facility, identified as GM-2, constructed in 1987, with a maximum production capacity of 1.33 metal units/hour, with no controls, and exhausting within the building

(l) A spray booth identified as 1-3, constructed in January 1991, with a maximum production capacity of 14 metal units/day, equipped with a dry filter for PM control, and exhausting through stack SV-1-3

(m) A spray area, identified as 1-6, constructed in January 1991, with a maximum production capacity of 1.33 metal units/hour, equipped with no controls, and exhausting within the building

(n) A spray area, identified as 1-7, constructed in January 1991, with a maximum production capacity of 1.33 metal units/hour, with no controls, and exhausting within the building

(o) A portable undercoating station, identified as 1-8, constructed in January 1991, with a maximum production capacity of 14 metal units/day, with no controls, and exhausting within the building

(p) An undercoat air assisted spray booth, identified as 5-10, constructed in August 1985, with a maximum production capacity of 0.55 metal units/hour, equipped with dry filters for PM control, and exhausting through stack SV-5-10

(q) An undercoat air assisted spray booth, identified as 5-12, constructed in August 1985, with a maximum production capacity of 0.55 metal units/hour equipped with a dry filter for PM control, and exhausting through stack SV-5-12

(r) A spray booth, identified as 5-13, constructed in August 1985, with a maximum production capacity of 5 metal units/day, equipped with dry filter banks for PM control, and exhausting through stack SV-5-13

(s) A spray paint area, identified as N-2, constructed in June 1991, with a maximum capacity of 1.11 metal units/hour, equipped with dry filter banks for PM control, and exhausting to stack SV-N-2

(t) A spray undercoating area, identified as A-2, constructed in June 1991, with a maximum capacity of 12 metal units/day, with no emission control, and exhausting within the building

(u) An air assisted undercoating booth, identified as N-1, constructed in June 1991, with a maximum capacity of 1.11 metal units/hour, equipped with a dry filter for PM control, and exhausting to stack SV-N-1

(v) A glue lamination air assisted spray facility, identified as 2-15, constructed July 25, 1991, with a maximum production capacity of 0.687 units per hour, equipped with no controls and exhausting within the building

(w) Four Safety Kleen gun cleaners, each equipped with remote solvent reservoirs, identified as SC-1, SC-2, SC-3, and SC-4, each using a maximum of 5 gallons of solvent per week, with no controls, and exhausting within the building

(x) Clean-up solvent processes for the source, with a maximum total usage of 6.5 gal of solvent per hour

(y) A plastic pultrusion machine, identified as M-1, constructed in February 1991, with a maximum capacity of 3.33 parts/hour, equipped with no controls, and exhausting within the building has been relocated to the P-Building

(z) A reciprocator, performing gel coating operation using FIT System and resin flow coating lamination, identified as M-2, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-2

(aa) A new portable MAS/FIT system for gel application, a reciprocator, performing resin lamination using a new automatic Chop FIT System, identified as M-4, constructed in February 1991, with a maximum production of 0.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M

(bb) A portable gelcoat FIT System, identified as M-3, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-3

One (1) small vehicle roof resin/gelcoat booth to be located in the old pultrusion area of the M-building to isolate the Flat Panel area from the Contoured Parts area, in order that fibers from the Flat Panel Area will not contaminate parts being made at the Contoured Parts area, utilizing existing gelcoat FIT System M-3 and existing Chop System M-6, with emissions from the booth exhausting through existing Stack SV-M-1

(cc) Two portable gelcoat operations, identified as M-5 and M-9 constructed in February 1991**,** both guns have been upgraded to a Portable FIT System, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stacks SV-M-5 and SV-M-9. M-5 is now located in the Flat Panel area, and M-9 is located in the Tru-Green area

(dd) Three portable chop/resin guns, identified as M-6, M-7, and M-8. M-6 gun has been upgraded with a portable Chop FIT System, for the application of chop resin wet out, and an atomized gun for the application of spraycore reinforcement. M-7 and M-8 have been replaced with Chop FIT Wall Mount System. All have been constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stack SV-M-6, SV-M-7, and SV-M-8

(ee) A FRP mold department, identified as B-1, constructed in August 1980, with a maximum capacity of 0.004 molds /hour, with no emission control, and exhausting to stack SV-B-1

(ff) A white resin air assisted spray gun, identified as B-2(a), constructed in August 1990, with a maximum capacity of 0.004 molds/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2

(gg) A Tru-green mold repair spray gun, identified as B-2(b), constructed in August 1990. with a maximum capacity of 1.33 parts/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2. Existing Venus portable airless/air-assisted spray system will be changed into a portable cup gun granite spray system

(hh) Two repair/touch-up FRP facilities, identified as N-3(a) and N-3(b), constructed in August 1987, each with a maximum capacity of 0.888 parts/hour, with no emission control, and exhausting within the building

(ii) Several fiberglass touch-up areas which operate as part of FRP production lines, using Binks 115 guns with no emission controls and exhausting within the buildings

(jj) Two bulk resin tanks, identified as M-13(a) and M-13(b), constructed prior to 1981, each with a maximum capacity of 40,000 gallons, with no emission control and exhausting through safety valves

(kk) A fiberglass reinforced plastic (FRP) cutting facility, identified as 7-1, constructed November 1990, with a maximum production of 0.65 lb. of grinding dust/hour, equipped with a cyclone for dust collection, and exhausting through stack SV-7-1

(ll) Grinder/buffer facilities, identified as M-10, constructed in February 1991, with a maximum capacity of 12 units/hour, equipped with dry filters for control and exhausting through stack SV-M-10

(mm) A woodworking facility, identified as N-4, constructed prior to 1987, with a maximum production capacity of 18.54 lb raw material/hour, equipped with a cyclone for dust collection, and exhausting through stack SV-N4

(nn) A woodworking facility, identified as 5-14, constructed July 25, 1991, with a maximum production capacity of 18.54 lb of raw product/hour equipped with a cyclone for sawdust collection, and exhausting through stack SV-5-14

(oo) A woodworking facility, identified as 1-9, constructed July 25, 1991, with a maximum capacity of 18.54 lb of raw product/hour, equipped with a cyclone for sawdust collection, and exhausting through stack SV-1-9

(pp) A woodworking facility, identified as Fleet Woodworking, consisting of a horizontal table saw, a cut-off saw, a radial arm saw, and a band saw, constructed July 1991, with a maximum production capacity of 504 boards per day, with a small drum cyclone/baghouse within the building for sawdust collecting, and exhausting within the building

(qq) Two waste wood furnaces, each with a wood storage silo, identified as 1-5 and M-12, constructed March 16, 1994, each of which have a maximum heat input capacity of 2.0 MMBtu per hour, and exhausting to stacks SV-1-5 and SV-M-12

(rr) Two parts washers, each equipped with remote solvent reservoirs, identified as PW-1 and PW-2, each using a maximum of 5 gallons of solvent per week, with no controls, and exhausting within the building

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

(a) This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment, including: [(326 IAC 6-3-2)Process Operations]

(A) Three stick welding stations, identified as Stick Fleet Welding, with a maximum production capacity of 6 pounds of welding stick per hour, with no controls, and exhausting within the building

(B) A four-torch oxyacetylene plasma cutting tool, identified as Fleet Torch, which has a cutting rate of 20 inches per minute, with no controls, and exhausting within the building

(C) Metal Inert Gas (MIG) welding stations, identified as MIG Welding, with a combined maximum production rate of 1080 pounds of welding wire per hour, with no controls and exhausting within the building

(D) Seventy-seven (77) MIG welding stations, sixteen (16) stick welding stations, twenty (20) oxyacetylene units, and a TIG welding station

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [(326 IAC 6-3-2)Process Operations]

(b) The requirement of CP 039-9080-00103, issued April 3, 1998, Condition D.1.1(b), requiring that any change or modification which may result in potential VOC emissions of 25 tons per year from the caulking operation shall require prior approval, is not applicable because pursuant to 326 IAC 2-7-1 (21), these caulking operations are classified as insignificant activities, and there are no permit conditions applicable to the insignificant caulking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(y) A plastic pultrusion machine, identified as M-1, constructed in February 1991, with a maximum capacity of 3.33 parts/hour, equipped with no controls, and exhausting within the building has been relocated to the P-Building

(z) A reciprocator, performing gel coating operation using FIT System and resin flow coating lamination, identified as M-2, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-2

(aa) A new portable MAS/FIT system for gel application, a reciprocator, performing resin lamination using a new automatic Chop FIT System, identified as M-4, constructed in February 1991, with a maximum production of 0.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M

(bb) A portable gelcoat FIT System, identified as M-3, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-3

One (1) small vehicle roof resin/gelcoat booth to be located in the old pultrusion area of the M-building to isolate the Flat Panel area from the Contoured Parts area, in order that fibers from the Flat Panel Area will not contaminate parts being made at the Contoured Parts area, utilizing existing gelcoat FIT System M-3 and existing Chop System M-6, with emissions from the booth exhausting through existing Stack SV-M-1

(cc) Two portable gelcoat operations, identified as M-5 and M-9 constructed in February 1991**,** both guns have been upgraded to a Portable FIT System, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stacks SV-M-5 and SV-M-9. M-5 is now located in the Flat Panel area, and M-9 is located in the Tru-Green area

(dd) Three portable chop/resin guns, identified as M-6, M-7, and M-8. M-6 gun has been upgraded with a portable Chop FIT System, for the application of chop resin wet out, and an atomized gun for the application of spraycore reinforcement. M-7 and M-8 have been replaced with Chop FIT Wall Mount System. All have been constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stack SV-M-6, SV-M-7, and SV-M-8

(ee) A FRP mold department, identified as B-1, constructed in August 1980, with a maximum capacity of 0.004 molds /hour, with no emission control, and exhausting to stack SV-B-1

(ff) A white resin air assisted spray gun, identified as B-2(a), constructed in August 1990, with a maximum capacity of 0.004 molds/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2

(gg) A Tru-green mold repair spray gun, identified as B-2(b), constructed in August 1990. with a maximum capacity of 1.33 parts/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2. Existing Venus portable airless/air-assisted spray system will be changed into a portable cup gun granite spray system

(hh) Two repair/touch-up FRP facilities, identified as N-3(a) and N-3(b), constructed in August 1987, each with a maximum capacity of 0.888 parts/hour, with no emission control, and exhausting within the building

(ii) Several fiberglass touch-up areas which operate as part of FRP production lines, using Binks 115 guns with no emission controls and exhausting within the buildings

(jj) Two bulk resin tanks, identified as M-13(a) and M-13(b), constructed prior to 1981, each with a maximum capacity of 40,000 gallons, with no emission control and exhausting through safety valves

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

VOC emissions from FRP units M-1, M-2, M-4, M-3, M-5, M-9, M-6, M-7, M-8, B-1, B-2(a), B-2(b), N-3(a), N-3(b), Binks 115 areas, M-13(a) and M-13(b), combined with VOC usage from surface coating units H-1, H-2, H-3, A-1, I-1, I-2, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, N-1, 2-15, cleaners SC-1,SC-2, SC-3, SC-4, and clean-up solvents, shall be no more than 240 tons of VOC per 12 consecutive month period. This usage/emission limit, with the estimation that insignificant activities will emit < 10 tons of VOC per year, is required to limit the source's potential to emit VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control devices.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the facilities shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.4 Best Available Control Technology (BACT) [326 IAC 8-1-6]

BACT for FRP production units M-1, M-2, M-3, M-4, M-5, M-6, M-7, M-8, M-9, B-1, B-2(a), B-2(b) N-3(a), N-3(b) and Binks115 touch up areas, shall be the following:

(a) The use of styrene-containing resins and gel coats shall be limited such that the potential to emit (PTE) VOC from the FRP units shall be less than 240 tons per twelve (12) consecutive month period. Compliance with this BACT limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference, which is included with this permit: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Associations (UEF, CFA July 17, 2001). Reciprocators M-2 and M-4 are the only units which qualify to use controlled spray emission factors. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be

considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	45
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

$$\sum Em_A \leq \sum (M_R * E_{Ra}) + \sum (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category

Em_A = Actual monthly emissions from all resins and gelcoats based on material specific emission factors, emission reduction techniques and emission controls

Units: *mass = tons*
emission factor = lbs of monomer/ton of resin or gel coat
emissions = lbs of monomer

(c) Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray mechanical

applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is defined as the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) A one (1) quart, air atomized spray gun may be used as needed for touch-up purposes only.

(f) The following work practices shall be implemented:

(1) To the extent possible, non-VOC, non-HAP solvents shall be used for cleanup.

(2) For VOC- and/or HAP-containing materials:

(A) Cleanup solvent containers shall be used to transport solvent from drums to work areas.

(B) Cleanup stations shall be designed as closed containers having soft gasketed spring-loaded closures and shall be completely closed when not in use.

(C) Solvent saturated cleanup rags shall be stored, transported, and discarded in containers that are tightly closed.

(D) Spray guns shall be designed to be cleaned without requiring the spraying of solvent into the air.

(E) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be discarded in such a manner that evaporation is minimized.

(3) Storage containers shall be covered when not in use.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may

require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.4(b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC Emissions

Compliance with Condition D.2.4(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.8 Particulate Matter (PM)

Dry filter banks for PM control shall be in operation on vented FRP units at all times the FRP units are in operation. Uncontrolled units shall be operated within a building, which will serve as PM control.

D.2.9 Operator Training

(a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) according to the following schedule:

(1) All personnel hired after the effective date of this rule shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (2) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(c) The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.

(d) Records of prior training programs and former personnel are not required to be maintained.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.10 Monitoring

(a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filter banks. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly visible emission notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) Monthly inspections shall be performed of the FRP emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(g) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(h) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.4, the Permittee shall maintain records in accordance with (1) through (4) below for the fiberglass operations. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.4.

(1) The usage by weight and volatile organic HAP monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(4) The calculated total volatile organic HAP emissions from resin and gel coat use for each month.

(b) To document compliance with Condition D.2.10, the Permittee shall maintain a log of weekly filter inspections, weekly visible emission notations, monthly overspray inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.4(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).